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*Attorneys for Irving H. Picard, Trustee for the  
Substantively Consolidated SIPA Liquidation of  
Bernard L. Madoff Investment Securities LLC  
and for the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively  
Consolidated SIPA Liquidation of Bernard L. Madoff  
Investment Securities LLC and Bernard L. Madoff,

Plaintiff,

v.

EVELYN CERNIS IRREVOCABLE TRUST  
AGREEMENT FOR SAMANTHA EYGES DTD  
OCTOBER 6TH 1986; MARILYN CERNIS, in her  
capacity as Trustee of the Evelyn Chernis Irrevocable  
Trust Agreement for Samantha Eyges dtd October 6th

No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04711 (SMB)

1986; RICHARD EYGES, in his capacity as Trustee of the Evelyn Chernis Irrevocable Trust Agreement for Samantha Eyges dtd October 6th, 1986; DAVID M. DUCHESNEAU, in his capacity as Trustee of the Evelyn Chernis Irrevocable Trust Agreement for Samantha Eyges dtd October 6th, 1986; and SAMANTHA C. EYGES,

Defendants.

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**STIPULATION AND ORDER FOR EXTENSION OF TIME TO CONDUCT INITIAL  
CASE CONFERENCE**

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Irving H. Picard (the “Trustee”), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.* (“SIPA”), and the substantively consolidated estate of Bernard L. Madoff individually, by and through his counsel, Baker & Hostetler LLP, and Defendants Evelyn Chernis Irrevocable Trust Agreement for Samantha Eyges dtd October 6th 1986, Marilyn Chernis, in her capacity as Trustee of the Evelyn Chernis Irrevocable Trust Agreement for Samantha Eyges dtd October 6th 1986, Richard Eyges, in his capacity as Trustee of the Evelyn Chernis Irrevocable Trust Agreement for Samantha Eyges dtd October 6th 1986, David Duchesneau, in his capacity as Trustee of the Evelyn Chernis Irrevocable Trust Agreement for Samantha Eyges dtd October 6th 1986, and Samantha Eyges (collectively, the “Defendants”) represent as follows:

**WHEREAS**, on November 10, 2010, this Court entered the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the “LPO”) [Adv. Pro. No. 08-01789 (SMB), Dkt. 3141];

**WHEREAS**, the Trustee commenced this action (the “Adversary Proceeding”) by filing

a complaint (the “Complaint”) on December 1, 2010 [Dkt. 1];

**WHEREAS**, Defendants filed an answer to the Complaint on July 18, 2014 [Dkt. 33];

**WHEREAS**, pursuant to the Notice of Applicability filed by the Trustee in this Adversary Proceeding on December 1, 2010 [Dkt. 2], the LPO and the avoidance procedures contained therein (the “Avoidance Procedures”) are applicable to the instant matter;

**WHEREAS**, under the Avoidance Procedures, “the parties shall meet, either in person or by teleconference, and confer on a mediation, discovery and litigation plan (the ‘Initial Case Conference’)” within 30 days after the last defendant files an answer to the Complaint (the “Initial Case Conference Period”);

**WHEREAS**, all Defendants have filed an answer to the Complaint on July 18, 2014 [Dkt. 33];

**WHEREAS**, the Trustee and Defendants have agreed to extend the Initial Case Conference Period in this Adversary Proceeding, which would otherwise have ended on January 16, 2015; and

**WHEREAS**, nothing in this Stipulation is a waiver of the Defendants’ right to request from the Court (and the Trustee’s right to object to any such request), or the parties’ rights to agree to, a further extension the Initial Case Conference Period.

**NOW, THEREFORE**, the Parties stipulate and agree to, and the Court **ORDERS**, that the Initial Case Conference Period is hereby extended to July 17, 2015.

New York, New York  
December 19, 2014

**BAKER & HOSTETLER LLP**

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*Attorneys for Defendants*

SO ORDERED ON December 19, 2014:

/s/ STUART M. BERNSTEIN  
HONORABLE STUART M. BERNSTEIN  
United States Bankruptcy Judge